

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

JOSEPH L. MANSON III,)	
d/b/a LAW OFFICES OF)	
JOSEPH L. MANSON III)	
)	
Plaintiff/Stakeholder,)	
)	
v.)	CA No. 1:18-cv-219-CMH/JFA
)	
UNIVERSITAS EDUCATION, LLC, <u>et al.</u>)	
)	
Defendants/Claimants.)	
)	

**EMERGENCY MOTION FOR INJUNCTION TO COMPLY WITH ORDER, TO
STAY ENFORCEMENT OF GARNISHMENT PROCEEDINGS, AND FOR
ISSUANCE OF RULE TO SHOW CAUSE**

Plaintiff Joseph L. Manson, III, d/b/a Law Offices of Joseph L. Manson III (“the Interpleader”), by and through counsel, files this Emergency Motion for Injunction to Comply with Order, to Stay Enforcement of Garnishment Proceedings, and for Issuance of Rule to Show Cause. Despite this Court’s Order granting Interpleader’s Motion for Leave to Deposit Funds, defendant Loeb & Loeb, LLP refuses to comply with the Order and permit the deposit of the funds. Specifically, Loeb refuses to remove its lien, filed weeks after this action was brought, upon the BB&T escrow account in which the Settlement Payment sits (“the BB&T Account”). Accordingly, BB&T will not allow the transfer, and Interpleader cannot deposit the funds as ordered.

The emergency nature of this action is required because, not only does Loeb have no legal basis to refuse to comply with the Court’s order and obstruct the deposit of the funds, but Loeb intends to proceed with its garnishment proceeding against the BB&T Account on Wednesday, June 27 in the Circuit Court for the City of Alexandria and have

that court award it part of the \$8 million Settlement Payment that this Court ordered to be deposited in the registry of the Court.¹

A Memorandum in Support is filed herewith. For the reasons stated therein, Interpleader-Plaintiff Joseph L. Manson III moves this Court to enter an Order:

(a) requiring Loeb to immediately release any and all liens or attachments upon the BB&T Account or Manson;

(b) requiring Loeb to instruct BB&T to permit the full amount of the \$8 million Settlement Payment to be transferred into the Court's registry, and taking any steps necessary to remove its lien and to allow BB&T to transfer such funds;

(c) enjoining any further attempt by Loeb to proceed with its garnishment action in Alexandria Circuit Court against Manson or the BB&T Account;

(d) enjoining Loeb or any party from instituting or prosecuting any proceeding in any court affecting the property involved in the interpleader action until further order of the Court;

(e) issuing a Rule to Show Cause why Loeb and its attorneys should not be held in contempt of this Court's Order;

(f) awarding to Interpleader his attorney's fees for having to file this motion to obtain Loeb's compliance with the Court's Order; and

(g) such other relief as to the Court seems proper.

¹ Given the imminent date -- next Wednesday -- at which Loeb intends to attempt to execute upon the BB&T Account, Interpleader seeks an expedited hearing before the Court, and will contact the Clerk's Office regarding scheduling of the same.

LAW OFFICES OF JOSEPH L. MANSON III
By Counsel

_____/s/_____

David I. Bledsoe
VSB 29826
Attorney for Interpleader-Plaintiff
600 Cameron Street, Suite 203
Law Office of David I. Bledsoe
Alexandria, VA 22314
703-379-9424
703-684-1851(fax)
bledsoelaw@earthlink.net

CERTIFICATE PURSUANT TO LOCAL RULE 7(E)

Pursuant to Local Rule 7(E), I certify that before filing this Motion, I conferred with opposing counsel in a good faith effort to obtain consent to this Motion.

_____/s/
David I. Bledsoe

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2018, the foregoing was filed with the Clerk of Court through the Court's CM/ECF system, which will then send a notice of the filing (NEF) to all counsel of record.

_____/s/
David I. Bledsoe